



GARY E. JOHNSON
GOVERNOR

State of New Mexico
ENVIRONMENT DEPARTMENT

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JOHN D'ANTONIO, JR.
SECRETARY

December 9, 2002

Gregg A. Cooke
Regional Administrator
U.S. Environmental Protection Agency, Region 6
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

RE: Potential Proposal to Include the Grants Chlorinated Solvents Plume Site, Grants, New Mexico, on the National Priorities List

Dear Mr. Cooke:

This letter is in response to the U.S. Environmental Protection Agency's (EPA) request for concurrence from the State of New Mexico regarding EPA's potential proposal of the Grants Chlorinated Solvents Plume Site (Site) to the National Priorities List (NPL). I am writing to you as Governor Gary Johnson's designee on environmental issues.

The Ground Water Quality Bureau of the New Mexico Environment Department (NMED) conducted a limited investigation of the Grants Chlorinated Solvents Plume Site. A plume of perchloroethylene-contaminated ground water is present in the shallow aquifer. Perchloroethylene has been detected at concentrations up to 26,000 micrograms/liter; in comparison, EPA's Maximum Contaminant Level for perchloroethylene in drinking water supplies is 5 micrograms/liter. Degradation products of perchloroethylene have also been detected in the shallow aquifer, including trichloroethylene, dichloroethylene, and vinyl chloride. The source and full extent of the contamination are unknown at this time. Municipal or private drinking water supply wells are not known to have been affected by the plume.

The underlying San Andres/Glorieta Aquifer is used regionally for water supply purposes. This aquifer is documented to have karst characteristics and is present at approximately 150 feet below the ground surface at the Site. There are concerns that the contaminant plume in the shallow aquifer could reach the San Andres/Glorieta Aquifer and migrate rapidly due to the karst characteristics. Additionally, contaminated ground water is seeping into a basement of

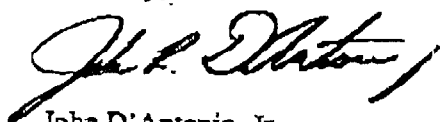
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one of the residences located above the plume. Given the high concentrations of volatile compounds in ground water and the shallow depth to water, there is considerable potential for vapor intrusion of contaminants into buildings (including residences) overlying the plume.

EPA informed NMED that the Site may be proposed for placement on the NPL given the Hazard Ranking System evaluation for the Site. Use of the Superfund Trust Fund is the most feasible mechanism available to fund remediation of the Site, as viable potentially responsible parties have not been identified to date.

NMED discussed the possible proposal of the Grants Chlorinated Solvents Plume Site to the NPL with the City of Grants. The Governing Body of the City of Grants expressed support for this course of action by passage of Resolution 02-1185 on November 18, 2002. A copy of this resolution is attached. Given the threat posed by the Site and the support of the City of Grants, the State of New Mexico strongly supports the efforts of EPA Region 6 to propose the Grants Chlorinated Solvents Plume Site to the NPL.

Sincerely,



John D'Antonio, Jr.
Secretary
New Mexico Environment Department

JD:gs

Cc: Gary Johnson, Governor
Ron Ortiz, Mayor, City of Grants
Myron Knudson, Director, Superfund Division, EPA Region 6

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RESOLUTION 02-1185
GRANTS CHLORINATED SOLVENTS PLUME SITE

WHEREAS, the City of Grants and the State of New Mexico have determined that a plume of chlorinated solvents containing tetrachloroethene (PCE), trichloroethene (TCE), dichloroethene (DCE) and Vinyl Chloride (VC) is present above drinking water standards in the alluvial aquifer near the area of the intersections of First Street and Washington, First Street and Jefferson and First Street and Monroe;

WHEREAS, the elevated levels of PCE, TCE, DCE and VC constitute contamination of the aquifer and have been discovered in the deepest monitoring wells in the area;

WHEREAS, there is an 11,000 square foot area of soil contaminated with PCE, TCE, and DCE at less than 2 feet below the ground surface;

WHEREAS, there are 5 municipal wells within a 4-mile radius of the Site with the closest wells being those of the City of Grants which are located within 1-1/2 miles of the Site,

WHEREAS, these wells are the sole source for domestic water for the approximately 10,000 residents of the community, and;

WHEREAS, at least seven residents live where the areas of observed soil contamination lies within their property and their residence is within 200 feet of the soil contamination;

WHEREAS, the Grants Chlorinated Solvents Plume poses a threat to the health and welfare of the City of Grants,

WHEREAS, no source for the release of chlorinated solvents could be positively identified, and;

WHEREAS, no viable Principal Responsible Party (PRP) has been identified to fund the investigation and remediation of the contamination;

WHEREAS, the costs associated with remediation activities of this type can run into the millions of dollars;

WHEREAS, the Governor of the State of New Mexico has the

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authority to request the Grants Chlorinated Solvents Plume Site be placed on the National Priorities List (NPL) for cleanup under the Superfund Program;

WHEREAS, New Mexico Environment Department Senior Management and the Governing Body of the City of Grants have determined that addressing the site through the Superfund Program is the best and only viable course of action because the current and future threat posed is of sufficient magnitude to merit placement on the National Priorities List for clean-up;

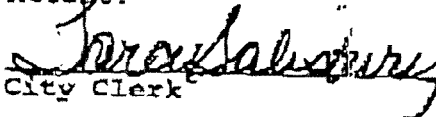
NOW, THEREFORE, WE, THE GOVERNING BODY OF THE CITY OF GRANTS, NEW MEXICO do hereby proclaim our full support and cooperation with the State of New Mexico Environment Department in requesting that the Grants Chlorinated Solvents Plume Site be placed on the National Priorities List for clean-up under the Superfund Program.

Adopted this 18th day of November, 2002


Mayor Ron Ortiz

11-18-02
Date

Attest:


City Clerk

11-18-02